

EXHIBIT 6

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
5:18-CV-00013

ATLANTIC COAST PIPELINE, LLC,

Plaintiff,

v.

11.57 ACRES, MORE OR LESS, IN
NASH
COUNTY, NORTH CAROLIN,
LOCATED ON PARCEL
IDENTIFICATION NO.
026095 IDENTIFIED IN BOOK 528,
PAGE 373; LOCATED ON PARCEL
IDENTIFICATION NO. 026132
IDENTIFIED IN BOOK 530, PAGE 432,
AND OWNED BY WALTER MARVIN
WINSTEAD.,

Defendants.

**DECLARATION OF DONOVAN
MCLAURIN**

DECLARATION OF DONOVAN E. MCLAURIN

I, Donovan E. McLaurin, declare and state as follows:

1. I am of legal age and am competent to give this declaration. All information herein is based on my own personal knowledge unless otherwise indicated.

2. I am a lifelong resident of Cumberland County and live at 7574 River Road, Wade, NC 28395.

3. I am the President of McLaurin Company, Inc. ("McLaurin Co"), through which the company owns four parcels totaling almost 230 acres adjacent to and near the Cape Fear River. There are blue line streams and wetlands on the property. A map showing the 4 parcels and locations of streams and wetlands is attached as **Exhibit. A**. I had prepared plans for subdividing and developing the property..

4. I was contacted by several different land agents who said they represented the Atlantic Coast Pipeline and wanted an easement for a 36" high pressure pipelines across my property. I explained that I was not interested in selling an easement for a big pipeline because I wanted to subdivide and develop the property.

5. The initial offer they made was very low. Later, they came to me with a check for approximately \$36,000 and said that if I did not take the check, they would take the property from me by eminent domain. The next letter I got from them offered to double that amount which I refused. Later I got a letter reducing that amount. By the end of 2017, they withdrew all offers to negotiate.

6. In early 2018, I received court documents relating to condemnation of almost 11 acres of my property by the Atlantic Coast Pipeline, Case No. 5:18-CV-48-BO.

7. At that time, because I was the sole care-giver for my father who was dying, I did not review the papers closely nor did I hire an attorney to assist me.

8. I learned weeks later that on the day before my father died, the court ruled that the Atlantic Coast Pipeline had the right to seize my property even though I never had my day in court.

9. Six months after my father passed away, my oldest son passed away.

10. At some point I learned that the pipeline had a court order to come on my land and that they had deposited \$46,000 with the court as “just compensation” for the destruction of my property.

11. In late November, the Atlantic Coast Pipeline arrived on my property without notice with dozens of workers with chain saws. A un-uniformed security guard was stationed approximately one-eighth mile away in the Mount Olive Church parking lot in an unmarked four wheel drive vehicle. These security guards of Duke/Dominion are usually employed by Tiger Swan. The workers began cutting down trees along an approximately 150 ft. wide path. The map attached as **Exhibit A** shows the approximate location of the pipeline within the tree clearing, the stream crossings and the wetlands.

12. They worked nonstop for several days cutting down trees in the wetland and dry areas across my property. Completing their work just as their permit from the US Army Corps of Engineers was revoked on November 20, 2018. They skipped over the property next to mine leaving the trees at this time as the owners of this property had agreed to their demands.

13. In disbelief of the destruction I saw across my property and adjoining property, on November 27, 2018, I hired a helicopter pilot and a photographer to take pictures of the destruction through the swamps and across my land.

14. Attached as Exhibit B are true and accurate copies of photographs taken at my request on November 27, 2018.

I declare under penalty of perjury the foregoing is true and correct to the best of my knowledge.

Executed on this 23 day of April, 2020.



Donovan McLaurin

EXHIBIT A

ArcGIS Web Map_McLaurin



4/23/2020, 2:32:50 PM

FEMA NC Floodplains

- AE
- 0.2 PCT ANNUAL CHANCE FLOOD HAZARD

Bridges Over Waterways crossed by ACP

ACP Road Crossing Points

River and Stream Crossings

ACP Route Wetlands

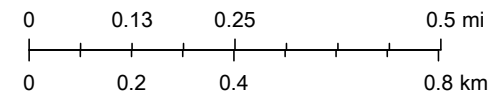
Classified Surface Water

Streams

Parcels

ACP Counties

1:18,056



Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus

EXHIBIT B

"EXHIBIT B"

RIVER ROAD, WAD

R RIVER

STREAM

STREAM

TEAM LINES SHOWN ARE APPROXIMATE

STREAM





SEWER LIFT STATION

STREAM

STREAM

STREAM

STREAM

CAPE FEAR RIVER

"EXHIBIT B"

RIVER ROAD, WADE, N

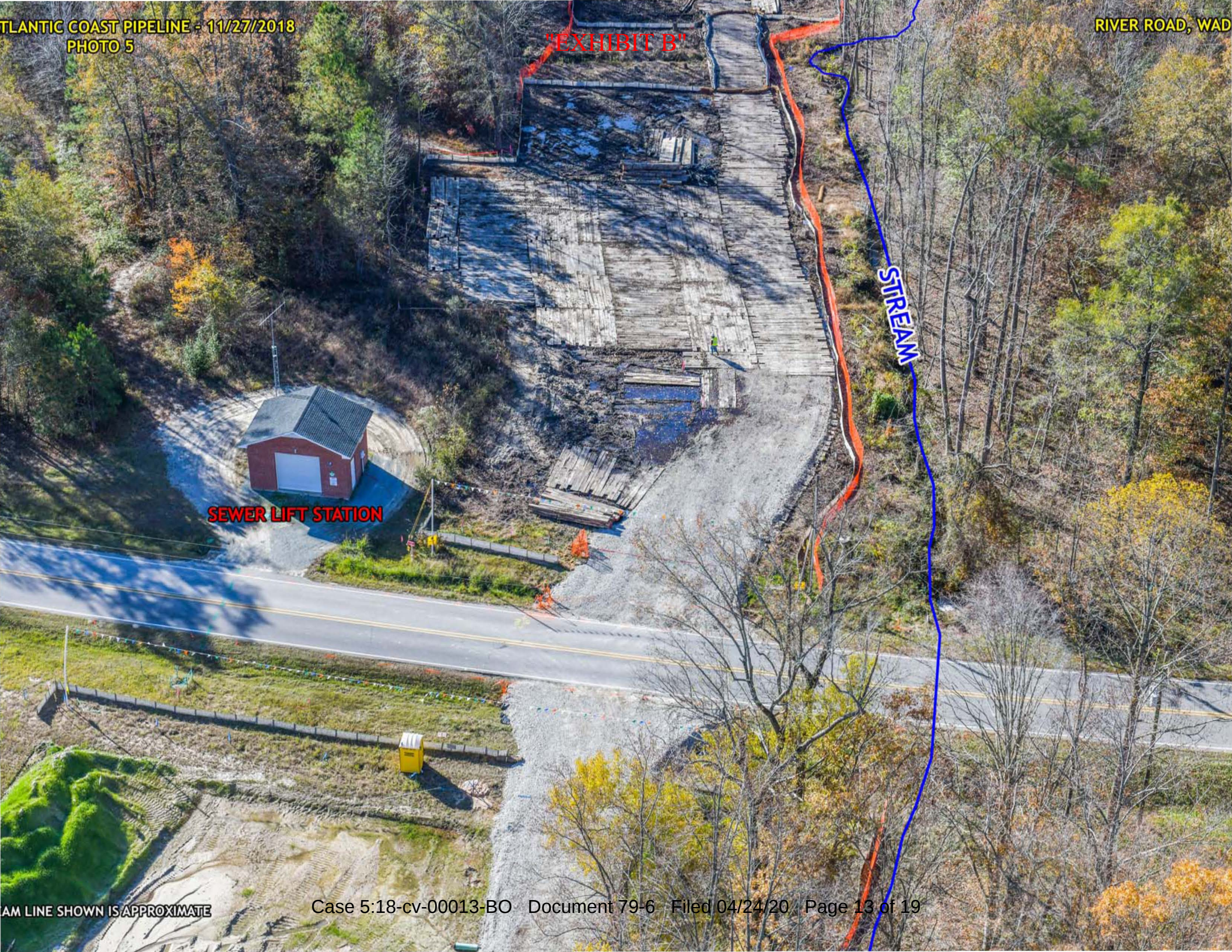


(NOTE WORKERS)



STREAM

AM LINE SHOWN IS APPROXIMATE



"EXHIBIT B"

APPROXIMATE PROPOSED PIPELINE LOCATION



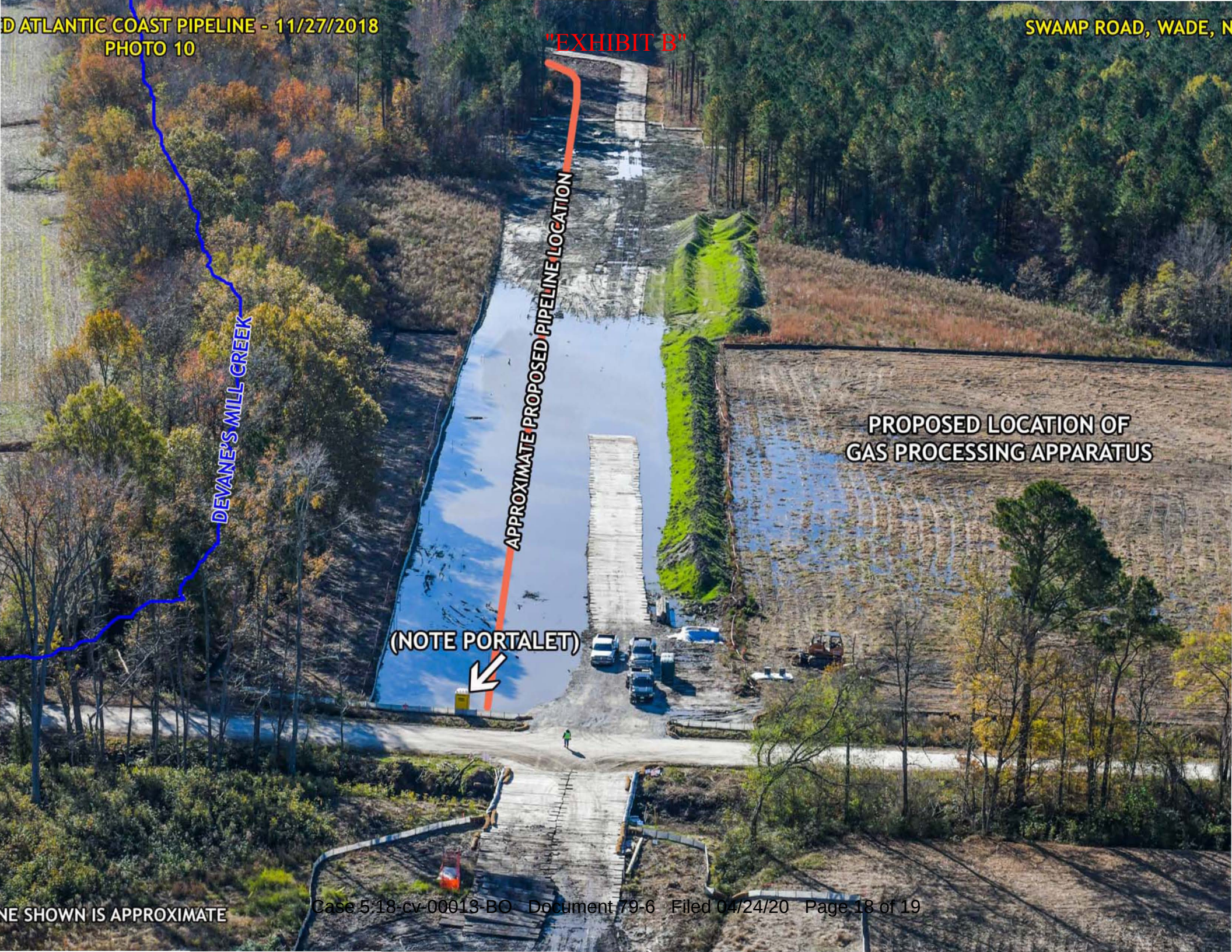
APPROXIMATE PROPOSED PIPELINE LOCATION

"EXHIBIT B"

APPROXIMATE PROPOSED PIPELINE LOCATION



APPROXIMATE PROPOSED PIPELINE LOCATION





"EXHIBIT B"

PROPOSED LOCATION OF
GAS PROCESSING
APPARATUS

APPROXIMATE PROPOSED PIPELINE LOCATION

(NOTE PORTALET)